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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: CATHODE RAY TUBE (CRT)) Master File No. CV-07-5944 SC
ANTITRUST LITIGATION)
) MDL No. 1917
)
) **DECLARATION OF LAUREN C.**
) **CAPURRO IN SUPPORT OF INDIRECT**
) **PURCHASER PLAINTIFFS' MOTION**
) **TO REMOVE INCORRECTLY FILED**
) **DOCUMENTS, DOCKET NUMBERS**
) **2574 AND 2574-1**

This document relates to:

ALL INDIRECT PURCHASER ACTIONS

1 I, Lauren C. Capurro, declare:

2 1. I am an attorney duly licensed by the State of California and am admitted to
3 practice before this Court. I am an associate with the law firm Trump, Alioto, Trump & Prescott,
4 LLP and my firm serves as Lead Counsel for the Indirect Purchaser Plaintiffs (“Plaintiffs”) in the
5 above-captioned action. I make this declaration on personal knowledge and if called as a witness
6 could and would testify competently thereto.

7 2. I inadvertently filed the unredacted version of Exhibit 1 to the Notice of Errata
8 Regarding Exhibit 41 to Declaration of Lauren C. Capurro In Support of the Indirect Purchaser
9 Plaintiff’s Opposition to Philips Taiwan Limited’s and Philips Do Brasil Ltda’s Motion to
10 Dismiss for Insufficient Service of Process and Lack of Personal Jurisdiction (Docket No. 2574)
11 (“Notice of Errata”).

12 3. Defendant Koninklijke Philips Electronics N.V. produced the document that I
13 filed as Exhibit 1 to the Notice of Errata and designated it as Highly Confidential pursuant to the
14 Stipulated Protective Order (Docket No. 306).

15 4. After being made aware of the error, my office emailed Judge Conti’s document
16 correction email address and called the ECF Help Desk to put a temporary lock on the document.

17 5. I also refiled the Notice of Errata with a redacted version of Exhibit 1, and filed
18 the unredacted version of Exhibit 1 conditionally under seal pursuant to Local Rule 79-5(b). *See*
19 Docket No. 2595.

20
21 I declare under penalty of perjury under the laws of the United States that the foregoing is
22 true and correct. Executed this 29th day of May 2014, at San Francisco, California.

23
24 /s/Lauren C. Capurro

25 Lauren C. Capurro
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